

1 DANIEL G. BOGDEN  
United States Attorney  
2 District of Nevada  
JIAMIN CHEN  
3 Assistant United States Attorney  
333 Las Vegas Boulevard South, Suite 5000  
4 Las Vegas, Nevada 89101  
702-388-6336

5  
6 UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

7 -oOo-

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 vs.

11 MICHAEL FRIEDMAN,

12 Defendant.

) Case No.: 2:16-cr-00103-GMN-GWF  
)  
)  
) STIPULATION FOR PROTECTIVE  
) ORDER  
)  
)  
)  
)  
)

13  
14 IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden,  
15 United States Attorney for the District of Nevada, and Jiamin Chen, Assistant United States  
16 Attorney, and Brenda Weksler, counsel for defendant MICHAEL FRIEDMAN, that this Court  
17 issue an Order protecting from disclosure to the public any documents disclosed which contains  
18 personal identifying information such as account numbers, Social Security numbers, drivers  
19 license numbers, dates of birth, Email addresses, or physical addresses, of participants,  
20 witnesses, and others in this case. Such documents shall be referred to hereinafter as "Protected  
21 Documents." The parties state as follows:

22 ///

1           1.     Certain information contained in discovery materials to be disclosed by the  
2 government and defendant includes or may include personal identifiers, including account  
3 numbers, Social Security numbers, drivers license numbers, dates of birth, Email addresses, and  
4 physical addresses, of participants, witnesses, and others.

5           2.     Discovery in this case is estimated to be between 150 and 200 pages. Given the  
6 nature of the allegations and the facts and circumstances surrounding the crimes with which the  
7 defendant is charged, that is, creation and submission of fraudulent tax documents, many of the  
8 documents include personal identifiers. Redacting the personal identifiers of participants,  
9 witnesses and others would prevent timely disclosure of this material.

10          3.     As part of discovery production, the United States may produce Protected  
11 Documents to the defendant without redacting the personal identifiers of participants, witnesses,  
12 and others, with the possible exception of certain materials it reserves the right to produce in  
13 redacted form.

14          4.     Access to Protected Documents will be restricted to persons authorized by the  
15 Court, namely Defendant, attorneys of record, and their associated counsels, paralegals,  
16 investigators, experts, and secretaries employed by the attorneys of record and performing  
17 services on behalf of Defendant.

18          5.     The following restrictions will be placed on the above-designated individuals  
19 unless further ordered by the Court. The above-designated individuals shall not:

- 20           a.     make copies for, or allow copies of any kind to be made by any other person of  
21 Protected Documents, or allow the Protected Documents to be otherwise disseminated;  
22           b.     allow any other person to read Protected Documents; and  
23  
24

1 c. use Protected Documents for any other purpose other than preparing to defend  
2 against the charges in the Indictment or any further superseding indictment arising out of this  
3 case.

4 6. Defendant's attorney shall inform any person to whom disclosure may be made  
5 pursuant to this order of the existence and terms of this Court's order.

6 7. The requested restrictions shall not restrict the use or introduction as evidence of  
7 discovery documents containing personal identifying information such as account numbers,  
8 Social Security numbers, drivers license numbers, dates of birth, Email addresses, and physical  
9 addresses during the trial of this matter.

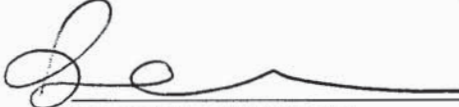
10 8. Upon initiation and conclusion of this matter, Defendant's attorney shall return  
11 to government counsel or destroy and certify to government counsel the destruction of all  
12 discovery documents containing personal identifying information such as account numbers,  
13 Social Security numbers, drivers license numbers, dates of birth, Email addresses, and physical  
14 addresses within a reasonable time, not to exceed thirty days after Defendant has exhausted all  
15 appellate rights.

16 DANIEL G. BOGDEN  
17 United States Attorney

18 Date: 5/6/2016

19 /s/  
JIAMIN CHEN  
Assistant United States Attorney

20 Date: 5/6/16

21   
BREND A WEKSLER  
22 Counsel for Defendant

23 IT IS SO ORDERED.

24 DATED: May 9, 2016

  
3 GEORGE FOLEY, JR.  
United States Magistrate Judge